

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND, DIVISION

JANE DOE	:	CASE NO: 1:22-cv-01677
	:	JUDGE: David Ruiz
Plaintiff	:	
	:	
-vs-	:	MOTION FOR LEAVE
	:	TO FILE AMENDED COMPLAINT
CUYAHOGA COUNTY, et al.	:	
	:	
Cleveland, Ohio 44115	:	
Defendant	:	
	:	

Now comes Plaintiff, Jane Doe, by and through counsel, and does hereby move this Honorable Court grant her leave to file an amended complaint in the above captioned matter in accordance with the provisions of Fed. R. Civ. P. 15. As grounds for the request to file an amended complaint, Plaintiff asserts that numerous underlying facts, relevant and necessary to both the original causes of action and the newly added causes of action have been discovered / occurred since the initiation of the original lawsuit. These include but are not limited to the grant of the administrative appeal, the changing of the finding from “abuse substantiated” to “abuse indicated” and the instatement of a new policy at Plaintiff’s employer that threatens both her current and future employment opportunities based on the findings of Cuyahoga County DCFS. Furthermore, the lack of right to any further review has given rise to new claims related to the Ohio Administrative Code Section defining “Abuse Indicated” as well as the statutory bar on further review which were not ripe at the time of the original filing.

These new claims necessitated the inclusion of an additional party, the State of Ohio Department of Job and Family Services, Office of Families and Children, who are responsible for the supervision of the Cuyahoga County DCFS, and the enforcement of the regulations

regarding “abuse indicated” findings and the maintenance of the Ohio Abused Children Registry, which by law, Plaintiff is now identified on. As Fed R. Civ. P. 15 encourages liberal grant of amendments, and the substantial change in the circumstances of the case, the change to the procedural posture of Plaintiff’s underlying dispute with Cuyahoga County CDFS as well as the ripening of new causes of action all support a grant of leave to file an amended complaint. The proposed amended complaint and accompanying exhibits are attached hereto and incorporated herein as fully rewritten.

Respectfully Submitted,

/s/ Jay F. Crook

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CERTIFICATE OF SERVICE

Notice of filing of the foregoing was made upon all parties to the litigation through the action of this Court’s Electronic Filing System, with a copy being made available to all parties through same.

Respectfully Submitted,

/s/ Jay F. Crook

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